

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

-----X	:	
	:	
RONALD CANTOR, IVAN SNYDER and	:	
JAMES A. SCARPONE, as TRUSTEES OF	:	
THE MAFCO LITIGATION TRUST,	:	
	:	C.A. No. 97-586-KAJ
Plaintiffs,	:	
	:	
v.	:	
	:	
RONALD O. PERELMAN,	:	
MAFCO HOLDINGS INC.,	:	
MacANDREWS & FORBES HOLDINGS INC.,	:	
ANDREWS GROUP INCORPORATED,	:	
WILLIAM C. BEVINS and	:	
DONALD G. DRAPKIN,	:	
	:	
Defendants.	:	
	:	
-----X	:	

MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS

Pursuant to the Scheduling Order dated October 18, 2005 and the directions of the Court during the telephone conference held November 8, 2005, upon the accompanying memorandum of law, the declaration of Emily A. Stubbs and the exhibits attached thereto, and all of the prior pleadings and proceedings in this action, plaintiffs Ronald Cantor, Ivan Snyder and James A. Scarpone, as Trustees of The MAFCO Litigation Trust, through their undersigned attorneys, hereby move this Court for an order, pursuant to Federal Rule of Civil Procedure 37(a)(2)(B), directing defendants to

produce documents withheld upon a claim of privilege in accordance with the attached proposed order.

ASHBY & GEDDES

/s/ Tiffany Geyer Lydon

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-and-

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Attorneys for Plaintiffs

Dated: November 22, 2005

163885.1

CERTIFICATION PURSUANT TO LOCAL RULE 7.1.1

Pursuant to Local Rule 7.1.1, attorneys for plaintiffs state that they have made a reasonable effort to reach agreement with the opposing attorneys on the matters set forth in the motion to compel the production of documents withheld by defendants upon a claim of privilege.

/s/ Tiffany Geyer Lydon

Tiffany Geyer Lydon

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JAMES A. SCARPONE, as TRUSTEES OF	:	
THE MAFCO LITIGATION TRUST,	:	
	:	C.A. No. 97-586-KAJ
Plaintiffs,	:	
	:	
- against -	:	
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RONALD O. PERELMAN,	:	
MAFCO HOLDINGS INC.,	:	
MacANDREWS & FORBES HOLDINGS INC.,	:	
ANDREWS GROUP INCORPORATED,	:	
WILLIAM C. BEVINS and	:	
DONALD G. DRAPKIN,	:	
	:	
Defendants.	:	
-----X	:	

ORDER

On this ____ day of _____, 2005, the motion of plaintiffs

Ronald Cantor, Ivan Snyder and James A. Scarpone, as Trustees of The MAFCO
Litigation Trust, pursuant to Federal Rule Civil Procedure 37(a)(2)(B), is hereby granted.
Defendants are directed to (1) produce to plaintiffs documents identified on their
privilege log as numbers 1, 11, 17, 29-37, 42-45, 47-48, 53, 62, 64, 66, 68, 70, 85, 88-90,
and 92, and (2) provide to the Court for review *in camera* documents identified on their
privilege log as numbers 5, 6, 10, 13-15, 21 & 22.

The Honorable Kent A. Jordan
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of November, 2005, the attached **MOTION TO COMPEL THE PRODUCTION OF DOCUMENTS** was served upon the following counsel of record at the address indicated below in the manner indicated:

Anthony W. Clark, Esq.
Skadden Arps Slate Meagher & Flom LLP
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Wilmington, DE 19899

VIA HAND DELIVERY

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VIA FEDERAL EXPRESS

/s/ Tiffany Geyer Lydon

Tiffany Geyer Lydon